

# Oklahoma Employment Security Commission

*COPY*

Jon Brock, Executive Director

Brad Henry, Governor

**Representing Employers**Julius Hliburn, Commissioner  
Ted Weber, Commissioner**Representing the Public**  
Rev. W. B. Parker, Chairman**Representing Employees**David Hill, Commissioner  
Mike Wester, Commissioner

September 24, 2004

Joseph C. Juarez, Administrator  
U.S. Department of Labor  
Employment and Training Administration  
525 Griffin Street, Room 317  
Dallas, TX 75202

Dear Mr. Juarez,

On behalf of the Oklahoma Employment Security Commission, the administrative entity for the Workforce Investment Act (WIA), I am requesting a continuation of our waiver regarding ***Subsequent Eligible Training Provider (ETP) Requirements; 18 month subsequent eligibility requirement (WIA Sec. 122(c)(5) and 20 CFR 663.530*** until March 31, 2005. Our initial request was to extend the period of "Initial Eligibility of Training Providers" through December 31, 2003 and to postpone the "Subsequent Eligibility of Training Providers" period until January 1, 2004. Despite significant efforts, we have not yet fully recaptured lost initial eligible training provider data nor begun the process to implement the subsequent eligibility process according to our timeline, which called for full implementation by January 1, 2004. Waiver of the referenced provision was granted by Emily Stover DeRocco in her letter dated January 21, 2003. This request is submitted pursuant to ETA's invitation to submit an abbreviated request to justify additional time.

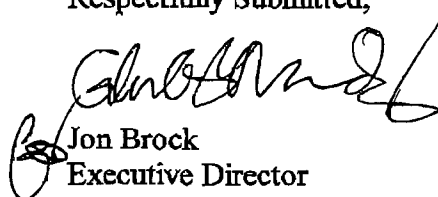
Initial Training Provider data was originally collected and data entered into a Lotus Notes coded operating system. That system failed during transition to our new operating system and all attempts to recapture the data were unsuccessful. Over the past year, the State office has been reentering initial training provider data in the new format required by our host, America's Job Link Alliance, for validation by WIA Boards. Significant progress has been made, yet anticipated completion of the initial training provider recapture cannot be completed until December 31, 2004.

A 15-month extension to our waiver period for each phase of the requirements outlined in WIA Sec. 122(c)(5) plus 20 CFR 663.530 and CFR 663.635 should provide sufficient time to:

- complete the recapture of data (October 31, 2004)
- prepare and distribute the ETP list to WIA Boards for application of performance data (December 31, 2004); and
- complete the requirements for subsequent eligibility determination (March 31, 2005).

Questions regarding this request may be directed to Robyn Coman at (405) 557-5216 or [robyn.coman@oesc.state.ok.us](mailto:robyn.coman@oesc.state.ok.us).

Respectfully Submitted,



Jon Brock  
Executive Director

Cc: U.S. Department of Labor  
Employment and Training Administration  
Attn: Maxine Bradley  
1999 Broadway, Suite 1780  
Denver, CO 80201

<b>U.S. DEPARTMENT OF LABOR</b> Employment and Training Administration 1999 Broadway, Suite 1780 Denver, Colorado 80202-5716	ORIGINAL UNIT:
	FILE NUMBER:
	DATE:

Telephone Numbers: (303) 844-1650  
(303) 844-1744 (FAX)

## FAX TRANSMITTAL SHEET

TO: *Sean Kelly*

PHONE NUMBER:

FAX NUMBER: *202-693-3015*

FROM: *M. Bradley*

NUMBER OF PAGES INCLUDING TRANSMITTAL SHEET: *3*

SUBJECT: *Waiver, OK*

COMMENTS:

*I will send the Colorado waiver when it's signed. The copy they sent me does not have a signature.*